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BUREAU OF REAL ESTATE
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8 BEFORE THE BUREAU OF REAL ESTATE
9
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of)
13 RHIANNA EILEEN WILLIAMS,) H- 6179 SAC
14 Respondent.) FIRST AMENDED
15) STATEMENT OF ISSUES
16)
17)
18)
19)

20 The Complainant, HEATHER NISHIMURA, in her official capacity as a Deputy
21 Real Estate Commissioner of the State of California, brings this First Amended Statement of
22 Issues against RHIANNA EILEEN WILLIAMS, ("Respondent") and is informed and alleges as
23 follows:

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25 On or about March 11, 2014, Respondent made application to the Bureau of Real
26 Estate of the State of California ("the Bureau") for a real estate salesperson license.

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28 On or about November 1, 2006, in the Superior Court of the State of California,
29 County of San Joaquin, Case No. SM253819A, Respondent was convicted, upon a plea of guilty,
30 of violating Section 484(a) of the Penal Code (petty theft), a misdemeanor, and a crime which

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1 bears a substantial relationship under Section 2910, Title 10 of the California Code of
2 Regulations to the qualifications, functions, or duties of a real estate licensee.

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4 On or about September 16, 2013, in the Superior Court of the State of California,
5 County of San Joaquin, Case No. SF124644A, Respondent was convicted, upon a plea of no
6 contest, of violating Section 148 of the Penal Code (resist/obstruct peace officer), a
7 misdemeanor, and a crime which bears a substantial relationship under Section 2910 of the
8 Regulations to the qualifications, functions, or duties of a real estate licensee.

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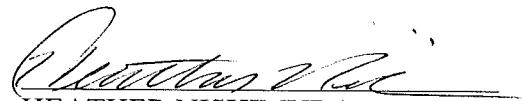
10 The facts alleged in paragraphs 2 and 3, above, constitute cause for denial of
11 Respondent's application for a real estate license under Sections 480(a)(1) (denial of license by
12 board-conviction of crime) and 10177(b) (conviction of crime substantially related to
13 qualifications, functions or duties of real estate licensee) of the Business and Professions Code
14 ("the Code").

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16 The facts alleged in paragraph 2, above, constitute cause for denial of
17 Respondent's application for a real estate license under Sections 480(a)(2) (denial of license by
18 board-fraud or dishonesty) and 10177(j) (fraud or dishonesty) the Code.

19 WHEREFORE, Complainant prays that the above-entitled matter be set for
20 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
21 authorize the issuance of, and deny the issuance of a real estate salesperson license to
22 Respondent, and for such other and further relief as may be proper under other provisions of law.

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HEATHER NISHIMURA
Deputy Real Estate Commissioner

Dated at Sacramento, California
this 8th day of April, 2015.